



"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

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November 28, 2023

VIA ECF

Hon. Richard Mark Gergel
U.S. District Court for the District of South Carolina
J. Waite Waring Judicial Center
83 Meeting Street
Charleston, South Carolina 29401

Re: *In re AFFF Products Liability Litigation*, MDL No. 2:18-mn-2873-RMG

Dear Judge Gergel:

On November 27, 2023, the Court entered CMO 27B extending the deadline for the parties to submit a proposed plan for the depositions in Tier Two fact discovery permitted under CMO 27 (the Telomer AFFF Bellwether Plan) and to present their agreed upon, or competing, Tier Two case proposals.

The parties have met and conferred and jointly respectfully request a one-week extension of this deadline to December 5, 2023. This second extension will allow the parties additional time to meet and confer on the Tier Two case proposals and develop their deposition plan for these cases, which will be based (at least in part) upon the Tier Two case proposal(s).

We thank the Court for its continued time and courtesies,

Respectfully submitted,

Fred Thompson, III
Plaintiffs' Liaison Counsel

Encl.

cc: All Counsel of Record (by ECF)
Cary Kotcher (by email) (Cary_Kotcher@scd.uscourts.gov)